

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA**

In re: ) Chapter 11  
 )  
MERCY HOSPITAL, IOWA CITY, ) Case No. 23-00623 (TJC)  
IOWA, *et al.* )  
 ) (Jointly Administered)  
Debtors. )  
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**[PROPOSED] AGREED ORDER GRANTING THE JOINT REQUEST OF MERCY  
HEALTH NETWORK, INC. AND TRUST OVERSIGHT COMMITTEE REGARDING  
SUBMISSION OF AGREED PROPOSED ORDER**

The matter before the Court is the *Joint Status Report and Request of Mercy Health Network, Inc. and Trust Oversight Committee* (the “Request”);<sup>1</sup> and the Court having found it has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue in this district is proper pursuant to 28 U.S.C. § 1409; and the Court having found that the relief requested in the Request is in the best interests of the Debtor, its creditors, and other parties in interest; and the Court having found that the Parties provided adequate and appropriate notice of the Request under the circumstances and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Request establish just cause for the relief granted herein:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows:

1. The Request is granted.
2. The deadline by which the Parties are to submit a proposed order regarding fact witness depositions for the Court’s consideration is hereby extended to June 24, 2025. To the extent the parties fail to submit an agreed proposed order by the June 24, 2025 deadline, the Court shall set a hearing on the Request.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Request.

3. Notwithstanding any applicability of any Bankruptcy Rule, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Parties are authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Request.

5. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.

Dated and entered this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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Honorable Thad J. Collins, Chief Judge

**Order prepared by:**

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**So Consented:**

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